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LETTER REGARDING U S NAVY RESPONSES TO GEORGIA DEPARTMENT OF NATURAL
RESOURCES COMMENTS ON FINAL PHASE I RESOURCE CONSERVATION AND
RECOVERY ACT FACILITY INVESTIGATION WORK PLAN FOR SOLID WASTE
MANAGEMENT UNIT 27 NSB KINGS BAY GA
9/30/2013
NSB KINGS BAY



DEPARTMENT OF THE NAVY

NAVAL SUBMARINE BASE
1063 USS TENNESSEE AVENUE
KINGS BAY, GEORGIA 31547-2606

IN REPLY REFER TO:

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Ser PRB4/1409

SEP 30 2013

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Ms. Amy Potter
Hazardous Waste Management Branch
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive, SE
Suite 1162 East
Atlanta, Georgia 30334

Dear Ms. Potter:

SUBJECT: FINAL PHASE I RFI WORKPLAN FOR SOLID WASTE MANAGEMENT
UNIT (SWMU) 27; NAVAL SUBMARINE BASE (SUBASE), KINGS BAY,
GEORGIA; PERMIT NO. HW-014(S&T)-4, GA EPA ID NO.
GA4170090001

SUBASE Kings Bay is pleased to submit the Final Phase 1 RCRA
Facility Investigation (RFI) Work Plan for SWMU 27 - the Former
Satellite Accumulation Area 2010-2 (enclosure).

This Final Work Plan incorporates the Navy's responses to
your comments received in your letter of August 5, 2013 as
described below.

Comment #1 - Section 3, Confirmation Sampling:

This Draft Phase 1 RFI Workplan does not state which
constituents will be analyzed for in the soil samples. Please
revise the work plan to state that all soil samples will be
analyzed for metals, volatile organic chemicals (VOCs), and
semi - volatile organic chemicals (SVOCs).

SUBASE KB Response: The work plan has been revised to include
those parameters as noted with the caveat that sampling near
asphalt could skew the actual data results for PAH's at shallow
depths due to constituents from the asphalt material.

Comment #2 - Section 3.1.1, Soil:

This section does not provide reference to the applicable
residential screening criteria. All soil samples should be
compared to EPA's Residential Regional Screening Levels (RSLs).
Please revise accordingly.

SUBASE KB Response: The work plan has been revised to state that soil samples will be compared to EPA's Residential Regional Screening Levels (RSLs).

Comment #3 - Section 3.1.1, Soil:

This section states that soil sampling will be conducted in accordance with EPD requirements. Please specify that soil sampling will be conducted per EPA's Field Branches Quality System and Technical Procedures, which can be found at the following website: <http://www.epa.gov/region4/sesd/tbqstp/>.

SUBASE KB Response: The work plan has been revised to state that soil sampling will be conducted in accordance with EPA's Field Branches Quality System and Technical Procedures.

Comment #4 - Section 3.1.2, Groundwater:

This section states, "If contamination is detected in soil samples above the applicable residential standards then a phase II assessment will address the shallow unconfined aquifer." In order to evaluate the potential for soil leaching to groundwater, the analytical results for subsurface soils must also be compared to the soil screening levels (SSLs) as identified in EPA's RSL table in addition to the Residential RSLs. Please revise accordingly.

SUBASE KB Response: The work plan has been revised to state that subsurface soils will also be compared to the SSLs identified in the RSL table in addition to the RSLs.

Comment #5 - Section 3.1.3, Sample Handling and Analysis:

This section states, "Sample preservation details, the type of container used for each sampling effort, as well as a summary of preservation requirements are described in the QAPP (Quality Assurance Project Plan)." Please submit a copy of the QAPP as we have not received a copy of this document.

SUBASE KB Response: A copy of the QAPP (UFP-SAP) will be submitted upon award of a contract to conduct the field activities. Under the Federal Acquisition Regulations, the Navy is required to award contracts to address certain tasks such as the UFP-SAP because this will require identification of a specific laboratory. The Contractor has sole responsibility to engage 3rd party support in their efforts to fulfill tasks as outlined in the Statement of Work.


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My point of contact is Mr. James Colter at 912-573-4048.
Please address any future correspondence relating to this matter
to Commanding Officer, 1063 USS Tennessee Avenue, Naval
Submarine Base, Kings Bay, GA 31547-2606.

Sincerely,

A handwritten signature in blue ink, appearing to read "H. L. Guffey, Jr.", written in a cursive style.

H. L. GUFFEY, JR.
Captain, U. S. Navy
Commanding Officer

Enclosure: Final Phase I RFI Workplan for Solid Waste
Management Unit (SWMU) 27